



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 27, 1978

Docket Nos. 50-329
50-330

Mr. S. H. Howell
Vice President
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Dear Mr. Howell:

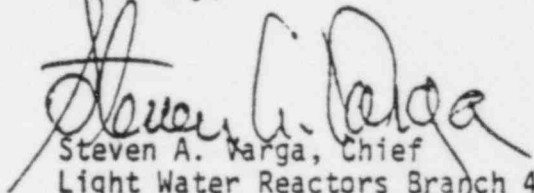
SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING CONSTRUCTION
PERMIT EXTENSION

We are continuing our review of your request of August 29, 1977 that Construction Permits CPPR-81 and CPPR-82 be amended to change the dates for completion of construction of Midland Plant, Units 1 and 2. The reasons for your request are set forth in Enclosure 1, which is Appendix E to the General Information volume submitted with your application for operating licenses.

We find that additional information on Appendix E is required for completion of our review. This additional information is requested by Enclosure 2.

Should you require clarification of our requests or desire a meeting on this matter, please do not hesitate to contact us.

Sincerely,


Steven A. Varga, Chief
Light Water Reactors Branch 4
Division of Project Management

Enclosure:
As stated

ccs: Listed on following page

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ENCLOSURE 2

1. Appendix E states that construction time was re-evaluated to include "changing project scope" which resulted "principally because of changed design and construction criteria for safety related systems and structures." During our meeting of March 21, and 22, 1978, you identified the more significant examples of changing project scope which influenced schedules. Of these examples stated (as listed in our meeting summary dated March 27, 1978), specify the pacing items which contributed to the schedule delay, and specify the relative significances of the various examples specified in terms of the schedule. Provide a general chronology (by dates) for those items of changed project scope which had a pacing effect on the Midland schedule, and showing overlaps of schedule influence between contributing events.
2. Appendix E states that construction time was re-evaluated to include experience from the industry which indicated that more time was needed to design and construct Midland Plant Units 1 and 2. Identify and describe the specific design and construction areas for Midland Plant Units 1 & 2 for which you found the schedule to be in need of revision, and the specific "industry experience" you used for the re-evaluation of each such Midland area.
3. Appendix E states that adverse financial conditions in 1974 and 1975 made it impossible to obtain financial resources on reasonable terms, that this resulted in adjusting construction and engineering activities, and resulted in a delay of 24 months for both units. Describe in greater detail how adverse financial conditions in 1974 and 1975 contributed to the delays for the Midland units. Specify what financing alternatives were considered to avoid these delays. Define the criteria which you used for judging the acceptability of these alternatives. Which specific areas of construction and engineering had the pacing influences and to what extent did each contribute to the total delay for the 24-month delay?
4. Describe the special Quality Assurance provisions which were and are being implemented for materials and components as a result of the extended construction period.
5. Appendix E accounts for 33 months of delay due to changing project scope (9 months) and financial conditions (24 months). However, the delay associated with operation of the first operating unit is 34 months (i.e., the difference between December 1, 1977 and October 1, 1980). What is the reason for this one additional month of delay?